



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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DATE: December 8, 1998

SUBJECT: Summary of Third Management Reviews for the Naval Education and Training Center in Newport, RI - Issues Raised and Their Resolution

FROM: Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

TO: Addressees

This memorandum serves to follow-up on the issues raised on December 2, 1998 during the third management review for the Naval Education and Training Center in Newport, RI. The parties agreed upon the remedy proposed for sediments adjacent to the McAllister Point Landfill, namely dredging in the near shore and monitoring of the offshore. The majority of the discussion about the remedies proposed focused on specific issues to be addressed before the upcoming ROD. These issues are discussed below.

1. *Issue:* Although several community members support dredging as the preferred remedy, some community members have expressed concern about the high cost of the environmental cleanup (currently estimated at \$24 million). It is unclear whether there will be substantial community opposition to the proposed remedy.

Resolution: There was agreement to undertake an outreach effort to discuss the proposed remedies and decision-making process with trustees, stakeholders, and affected parties. Specific concerns that remain will be handled when public comment is received on the proposed plan. Based on current cost estimates (which could be overestimated), the proposed remedy is not subject to the remedy review board at EPA headquarters (cost is less than \$30 million or it is over \$10 million and is 50% greater in cost than the least costly, protective, ARAR compliant alternative).

2. *Issue:* The RIDEM has expressed concern about how the PRGs were developed. EPA has stated that applying the Rhode Island water quality standards to the pore water will result in remediating the reference sites - and therefore the majority of Narragansett Bay.

Resolution: The PRGs developed for the aquatic pathway for copper and nickel will be carried through to the combined exposure pathway. The PRG developed for the avian predator pathway for lead will be carried through to the combined exposure pathway. Since the inorganics and organics are co-located, this will only affect the post-dredging confirmatory sampling. In other words, copper, nickel, and lead will be added to the list of contaminants to

measure in the sediments to ensure that the sediments remaining at the site do not exceed any of the combined exposure pathway final cleanup goals.

The final cleanup goals for the site may be higher than the baseline PRGs, but will not exceed the Navy's recommended PRGs. The ecological advisory board will meet to determine the final cleanup goals for the site and discuss management of site risks as proposed in the remedy.

Kymberlee found out that the PRGs for the PAHs developed for NETC are quite lower than those established for other cleanup remedies in the region (the range of sediment cleanup numbers for total PAHs was from 8.94 ppm to 33 ppm).

The development of the PRG for copper will be reevaluated to determine if it should be carried through as a final cleanup goal.

RIDEM explained their goal of restoring water quality in RI and that the goal at the McAllister Point Landfill is to meet Class SA water quality standards, as well as the overlying issue of natural resource damage ("NRD") issues that are not specifically addressed here.

3. Issue: The RIDEM will explain the basis for insisting that the near shore sediments are dredged. Applicable State ARARs that are driving this decision will be discussed.

Resolution: The RIDEM agreed to write to EPA (and the Navy) to explain why dredging is preferred over the capping and capping/dredging alternatives for the near shore sediments. A number of Rhode Island laws, federal laws, and natural resource trustee issues were discussed. Site specific physical conditions (*i.e.*, the high energy environment) will also be described as additional reasons why capping is not appropriate in this specific case. ARARs are identified in the FS and will be included in the ROD.

4. Issue: The RIDEM may require that dredging occurs only during certain months.

Resolution: EPA stated that it did not believe that limiting the dredging to certain months was an ARAR for the site. RIDEM agreed that there is some flexibility associated with the dredging window based on site-specific information, but expressed interest in avoiding critical spawning times to avoid injury to aquatic resources. EPA agreed that dredging should not unduly harm critical aquatic resources, but also recognizes the long-term benefits to the marine ecosystem of removing hazardous materials as expeditiously as possible. The dredging window will be discussed before the ROD so that more realistic estimates may be developed for the length of the construction period and costs (overall cost could decrease if there are fewer mobilization cycles).

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